

## **Exhibit D**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUPAN CHAKMA, SULOY TRIPORA, TAPAN  
KANTI TANCHANGYA, TIYANIT KAEWPAN,  
and PRAMITA CHAKMA, on behalf of themselves  
and others similarly situated

Plaintiffs,

v.

23-cv-08704 (KPF)

SUSHI KATSUEI, INC. d/b/a SUSHI KATSUEI  
PARK SLOPE, ROYAL KATSUEI, INC. d/b/a  
SUSHI KATSUEI WEST VILLAGE, AYE AYE  
SWE, and AUNG KO WIN,

Defendants.

**DECLARATION OF JIE WEI**

I, Jie Wei, under penalty of perjury, declare as follows:

1. I was formerly employed by Sushi Katsuei restaurant. I am familiar with the facts and circumstances set forth herein.
2. I worked as a server at Sushi Katsuei in Brooklyn from approximately September 2021 until March 2022.
3. When I worked at Sushi Katsuei, my manager was a woman we referred to in the restaurant as Maya or Maya San.
4. When I worked at the restaurant, Maya had my phone number and she would text me about my schedule and other issues at the restaurant.
5. Until earlier this month, I had only spoken to Maya one time since I stopped working at Sushi Katsuei. On that occasion, I had called her to try and make a reservation at the restaurant.

6. Earlier this month, Maya called me and informed me that there was a case pending against the Sushi Katsuei restaurant and its owners and that I was included in the case.

7. Maya asked me if I would do her a favor and exclude myself from the lawsuit.

8. Prior to this phone call from Maya, I had no idea that there was a lawsuit against Sushi Katsuei and certainly did not know that I was included in the class of employees in the case.

9. In other words, Maya was the first person to inform me that I was a class member in this case.

10. I later found out that a notice about a class action was sent to me but the address Sushi Katsuei provided for me was incorrect so I never received the notice.

11. At the conclusion of our call, I informed Maya that I would think about what I wanted to do in terms of my participation in the case.

12. Since Maya and I spoke, she has called me at least five more times but I have not picked up. These multiple phone calls from Maya are pressuring me to exclude myself from the case.

13. In addition to calling me, Maya has also begun to send me text messages to pressure me to exclude myself from the lawsuit.

14. Attached here as Exhibit 1 are copies of text messages I received from Maya earlier today.

15. These messages are obviously manipulative and designed to somehow make me feel bad for being a class member in the case,

16. I have also been contacted by other Sushi Katsuei employees on Maya's behalf who have pressured me to exclude myself from the case.

17. I do not intend to exclude myself and wish to continue as a class member in this lawsuit.

I declare under penalty of perjury of the law of the United States that the foregoing is true and correct.

Dated: 6/25/2025 \_\_\_\_\_

Signed by:  
  
17BCC0F1FB7B4A6...  
By: \_\_\_\_\_  
Jie Wei

## **Exhibit 1**

12:39

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M



Maya-san &gt;

Jie San, Ohayogozaimas!  
I hope you've been doing well.  
It's been a while since we  
worked together, but I still  
think back to the times we  
shared at Sushi Katsuei. You  
were always one of the most  
dependable and positive  
people on the team, someone  
who truly looked out for others  
and gave your all.  
The restaurant is going  
through a really tough time.  
There's a lawsuit happening,  
and I heard you might be  
getting a letter about it soon.  
I'm kindly asking, if you're  
willing, please sign the form to  
not be included in the lawsuit.  
It would mean more than you  
know.

This place isn't perfect, but it's  
home to a lot of people who  
work hard every day to keep it  
going. Right now, everyone  
here is just trying to stay  
afloat. You've always been a  
team player, Jie, and someone



iMessage



12:39 🌙

5G 62



M



Maya-san &gt;

and I heard you might be getting a letter about it soon. I'm kindly asking, if you're willing, please sign the form to not be included in the lawsuit. It would mean more than you know.

This place isn't perfect, but it's home to a lot of people who work hard every day to keep it going. Right now, everyone here is just trying to stay afloat. You've always been a team player, Jie, and someone who lifted the energy of those around you. If you can find it in your heart to help us out, it would be such a blessing.

We still think of you as part of the Katsuei family. Whatever you decide, I'll always respect it, but I hope you'll consider standing with us now like you always did back then. Please!!! 🙏🙏🙏  
Thank you very much.



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